

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BUNGIE, INC.,

Plaintiff,

v.

AIMJUNKIES.COM; PHOENIX
DIGITAL GROUP, LLC; DAVID
SCHAEFER; JORDAN GREEN;
JEFFREY CONWAY; and JAMES
MAY,

Defendants.

No. 2:21-cv-00811

PLAINTIFF BUNGIE, INC.'S
PROPOSED VOIR DIRE QUESTIONS

Pursuant to Local Rule 47(a) and the Court's May 25, 2023 Order (Dkt. No. 139), Plaintiff Bungie, Inc. ("Bungie" or "Plaintiff") provides the following proposed voir dire questions that Bungie requests be included in the examination. Bungie reserves the right to revise, supplement or amend these proposed voir dire questions as permitted by the Court, and further reserves the right to examine prospective jurors directly if and to the extent permitted by the Court.

BUNGIE'S PROPOSED VOIR DIRE QUESTIONS

1. Do you know or are you familiar with any of the parties in this case? If so, how?
2. Do you know or are you familiar with any of the attorneys, law firms, or law firm staff in this case? If so, how?
3. Do you know or are you familiar with any of the witnesses who are expected to testify in this case? If so, how?
4. Who is your current employer and what is your current occupation and job role?
5. What are your most common sources of news, including any specific websites, programs, or networks that you rely upon for your news and information?
6. Do you have any experience, training, or work history in the following areas? If so, please briefly explain.
 - a. Video Game Sales: Designing, developing, marketing or selling video games
 - b. Video Game Play: Playing video games
 - c. Software: Designing, developing, marketing, or selling software
 - d. Cheat Technology: Designing or using software to change or cheat another software
 - e. Sales, advertising, or marketing more generally
 - f. Licensing or the enforcement of licensing the use of a product or service
 - g. Regulations or the enforcement or compliance of rules or regulations
 - h. Law, the legal profession, or the court system
7. Do you have any familiarity, experience, or opinions - personal or professional - with copyrights, trademarks, patents or other intellectual property?
8. Do you believe that owning, using, or enforcing a copyright is an ineffective or unreasonable business strategy? Do you have any negative opinions of copyrights more generally? If so, please explain.

1 9. Have you or has ever been involved – personally or in your role at work - in a
2 dispute about property or a business deal?

3 10. Has anyone ever accused you of taking advantage of them in a business deal or
4 business opportunity?

5 11. Have you or has someone you know well ever been accused of unfairly using or
6 taking someone else's idea or property?

7 12. Have you ever been involved in a lawsuit before, either as a witness or as a party?
8 What was your role?

9 13. Have you personally or in your role at work ever used someone else's property
10 without a license or authorization? Did you feel that was your right to do so, and if so, why?

11 14. Have you ever worked in a job or role where you relied on another company's
12 products or materials to create or improve your company's product or service?

13 15. Are you interested or excited about deciding a lawsuit involving technical details,
14 or not so much?

15 16. Do you have any feelings or opinions based on what you've heard so far that
16 would make it difficult for you to be fair in a lawsuit claiming one company infringed the
17 copyrights of another company? If so, please explain.

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2 DATED: November 9, 2023

By: s/Jacob P. Dini

William C. Rava, Bar No. 29948

Christian W. Marcelo, Bar No. 51193

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CERTIFICATE OF SERVICE
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